



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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16 August 2002

Docket Management Facility
[USCG-2001-11865]
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Notification of Arrival in U.S. Ports

To Whom It May Concern:

This letter is intended to supplement our 5 August 2002 letter providing comments in response to the notice of proposed rulemaking (NPRM) that appeared in the 19 June 2002 *Federal Register* proposing permanent changes to the notification of arrival and departure requirements in 33 CFR 160, subpart C:

On 8 August 2002 (67 FR 51519), subsequent to the publication of the NPRM, the Customs Service published a NPRM "Presentation of Vessel Cargo Declaration to Customs Before Cargo is Laden Aboard Vessel at Foreign Port for Transport to the United States." We note that the Coast Guard has had the Customs Service's NRPM included in the rulemaking docket as a "supplement."

Provisions of the Customs Service's proposed rule seem to duplicate (b)(1), in whole or in part, the notice of arrival information included in the Coast Guard's proposed rule at §§ 160.207(b)(17) and 160.211(d)(21). If the proposed rule were adopted by the Customs Service, it would obviate the need for the Coast Guard to address this matter in its rules. If the Customs Service fails to adopt reporting requirements that meet its needs, there would seemingly be no justification for the Coast Guard retaining a requirement for Customs information to be submitted to the Customs Service.

Accordingly, we suggest that the Coast Guard not include any provisions in its rules requiring the provision of Customs information to the Customs Service.

We appreciate the opportunity to comment on the proposed rules and trust our comments will be given due consideration. If you have any questions about these comments, please feel free to contact me by phone at (281) 578-7171, ext. 207.

Sincerely,

Alan Spackman
Director, Offshore Technical
and Regulatory Affairs